

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al.**

**CHAPTER 11 CASE NO.  
09-50026 (REG)  
(Jointly Administered)**

**HON. ROBERT E. GERBER**

**Debtors.**

**CREDITOR ATUL C. SHAH, MD's  
CONCURRENCE IN DEBTORS' MOTION TO AMEND  
AND REQUEST FOR PROMPT RESOLUTION OF HIS CLAIM**

**NOW COMES ATUL C. SHAH, M.D.,** creditor in the above captioned case, and hereby concurs in Debtors' Motion To Amend the Order dated February 23, 2010, ("ADR Order") which, as claimed in the Motion, **simply adds Chicago, Illinois as a Mediation Location and amends the Schedule of Mediators.** Dr. Shah asks this Honorable Court to ensure there will be no further delays in these proceedings, that his claim will be promptly resolved in accordance with this Order and that the Court will advise all creditors including Dr. Shah as to whether they have to re-file the Cap letter which he, and probably others, has already submitted or whether they will have to re-submit the Cap Letter and start these long delayed procedures all over again.

**1. Creditor Shah notices that Debtor claims in Paragraph 5 of their Motion they state:**

**"Over the last several months, the ADR Order and the ADR Procedures have facilitated the efficient resolution of a number of unliquidated and/or litigation claims filed against the Debtors, while safeguarding the procedural rights of the holders of these claims. Indeed the Offer Exchange Procedures and mediations have caused many billions of dollars of unliquidated and/or litigation claims to be reduced and fixed as allowed general unsecured nonpriority claims, to the benefit of all creditors and the Debtors' estates".**


**2. Although he has filed promptly all necessary papers, and has contacted attorneys for**

Debtors, Creditor Dr. Shah has been given absolutely no information about further discussions or possibility of settling his claim.

3. Dr. Shah is puzzled that so many claims have been resolved but he has not heard one word about his claim even after contacting by phone and in writing a detailed brief on the basis for the amount he submitted in his Cap Letter and his willingness to enter into negotiations or the Alternative Dispute Resolution.

**WHEREFORE, CREDITOR ATUL C. SHAH REQUESTS THIS HONORABLE COURT TO GRANT THE DEBTORS' MOTION TO AMEND BUT ALSO ORDER THAT ATUL C. SHAH BE CONTACTED DIRECTLY BY DEBTORS' ATTORNEYS TO ENTER INTO NEGOTIATIONS OR ALTERNATE DISPUTE RESOLUTION OR OFFER AND EXCHANGE PROCEDURES AND MEDIATIONS SO THAT HIS CLAIM MAY BE DECIDED IN A TIMELY MANNER AND THAT HE BE AFFORDED THE SAME DUE PROCESS AND OPPORTUNITY TO HAVE HIS CLAIM PROMPTLY RESOLVED JUST LIKE THE CREDITORS WHOSE CLAIMS HAVE ALREADY BEEN RESOLVED AS MENTIONED IN DEBTORS' MOTION IN PARAGRAPH NUMBER 5.**

Respectfully submitted,



Atul C. Shah, MD  
Creditor

October 20<sup>th</sup>, 2010

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al.**

**CHAPTER 11 CASE NO.  
09-50026 (REG)  
(Jointly Administered)**


**Debtors.**

**HON. ROBERT E. GERBER**

**CERTIFICATE OF SERVICE**

On this the 20<sup>th</sup> day of October, 2010, I did furnish a true and accurate copy of the above Creditor Atul C. Shah, MD's Concurrence In Debtors' Motion To Amend And Request for Prompt Resolution Of His Claim upon Attorneys for Debtors in Possession by mailing same to their office address as disclosed in the pleadings.-

Respectfully submitted,

  
Atul C. Shah, MD  
Creditor

October 20<sup>th</sup>, 2010